IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re: Terrorist Attacks on September 11

Case No.: 03-md-1570

(GBD)(SN)

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN) (and member case Marie Laure Anaya, et al. v. Islamic Republic of Iran, 1:18-cv-12341(GBD) (SN))

(ANAYA/IRAN IV)

Declaration of Familial Relationship

I, Donovan Lanham, declare under penalty of perjury, as provided for by 28 U.S.C. §1746, that the following statements are true and correct:

- 1. My name is Donovan Lanham, and I am the step-son of the late Michael W. Lowe, who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that my stepdad, Michael, was the functional equivalent of my father. He was the only dad I have ever known.
- 2. My biological father's name is/was Gary Wade, and the last I heard, he lives in Jamaica, where he has been since he was deported in the 1990s. I only met Mr. Wade once when I was about 6 or 7 years old.
- 3. I was born in July 1987. My mother Vivian Lanham-Lowe and Michael were married in 1993. I have only vague recollections of the time before Michael was present in our lives. He was the man I called "dad" when I was growing up, and he was the only dad I ever had. He worked 2 jobs to support my mom and my brother and sisters and me.

1

- 4. Dad taught me to play chess when I was 9, and bought me my first chess set. He taught me to play sports, but more than that, he inspired me to play better through knowing my opponent and thinking rationally in the moment.
- 5. Dad took my brother Gary and I for truck rides in his work truck when he was working for the Local 3. On one occasion between 1995 and 1999, we actually made a drop off at the World Trade Center.
- 6. Saturdays were set aside for the family, and we would watch movies with dad. He liked gangster movies and karate movies. On occasion we would go to visit places like Coney Island, Staten Island, and FuncoLand in Queens.
- 7. Over the years I have come to acknowledge that Michael's death had a profound and lasting effect on me. After he died, I stopped going to school. I stopped being inspired. I had a child at a very young age to fill the void that his loss created. When he died, I was 14 years old. It took me more than 10 years to pull myself out of the downward spiral his death had caused. One night when I was about 26 or 27, something just clicked in me, and I realized that I needed to change my life. I needed to make him proud.
- 8. I have a steady job now and I have 1 child of my own. My son, Donovan Michael Lanham, who was born in 2004 is named after me and my dad. A photo of Donovan Michael is attached at Exhibit A. My son and my sister Charisma, Michael's biological daughter and my son's aunt, were very close growing up. See attached photos.
- 9. Michael was not my biological father, but he was a dad in every other sense of the word to me and my 3 siblings Gary, Jasmine, and Charisma.

Execution: 8 · 15 · 22

Name (signature): Name (printed): Sonavar Lanhan

Exhibit A

Donovan Michael Lanham

Charisma





